

Statement of The United Illuminating Company Concerning
H.B. 6607
An Act Concerning Electric Substations in Residential Areas

The United Illuminating Company submits this statement in opposition to **House Bill 6607 - An Act Concerning Electric Substations in Residential Areas**. The bill would amend the Connecticut Siting Council's governing statutes to require that a $\frac{3}{4}$ majority of the nine members of the Connecticut Siting Council vote to approve an electric substation or switchyard of 69-kV or above in residential areas. UI opposes this unnecessary legislation. The Siting Council has extensive experience in applying the established statutory criteria to the siting of substations in all areas of the state – in residential, commercial, industrial or mixed use areas – and this bill seeks to fix a problem that does not exist.

From its inception, the Siting Council has had the responsibility to balance the need for adequate and reliable public utility service with the need to protect the environment and ecology of the state while minimizing damage to scenic, historic and recreational values. The Council has considered hundreds of applications and petitions on a variety of infrastructures matters. In all cases, the staff and members of the Council have engaged in such fact-finding as is necessary for a thorough consideration of the proposed project and have done so in an open and transparent forum. The Council's adjudication process provides numerous opportunities for input by the various governmental entities, members of the General Assembly, the affected municipality and members of the public. In proceedings involving the possible location of a substation in or near a residential area, the Council's existing process already provides substantial procedural safeguards for any unique issues that may be presented by these projects. If a location is not the best location for a facility, taking into account all relevant siting criteria, the Siting Council will choose one of the alternate locations proposed by the utility. No change in the statutes is required for this to occur.

The proposed legislation is also unnecessary because the statutes today already provide for super-majority approvals in situations where a municipality objects to the proposed location of any substation within its boundaries. Connecticut General Statutes Section 16-50x(d) provides the opportunity for a host municipality's zoning and inland wetland agencies to "regulate and restrict" the location of a substation facility and an appeal from such action is made to the Council. It then takes a vote of *six out of the nine members of the Council* to affirm, modify or revoke such order or make any substitute order. Normally, substation projects can be approved by a simple majority vote.

To select a proposed site for the development of a new substation, sites are identified and screened in accordance with established objectives (including such things as compatibility with existing land used, minimization of effects on environmental resources, maintenance of public health and safety and cost effectiveness, electrical system needs and benefits). Therefore, if a site near a residential area is determined by a utility company to be the most suitable for a substation, then choosing an alternative

location is almost certain to result in higher costs and more infrastructure (due to the increased costs associated with connecting the substation to the load). Also, if load growth occurs in residential locations, it may make sense for a residential location to be the most suitable location for a substation, especially if alternatives include the building of a substation away from the load which requires a build-out of substantially more new distribution or transmission lines to connect the substation to the load.

This bill offers a solution to a problem that does not exist. The Siting Council has functioned extremely well in siting substations under existing statutes. UI believes that the Council's existing statutes, regulations and guidelines provide an adequate framework for the Council to carry out its role of objectively balancing the infrastructure needs of the state with its responsibility of protecting the environment and public – including those issues associated with the siting of substations in residential areas. No additional procedural safeguards are needed by increasing the number of members required for approval.